

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DIBY AKO

PLAINTIFF

vs.

No. 3:22-cv-1751-S

**ARRIVA BEST SECURITY, INC.,
and AMOIFO KOFFI**

DEFENDANTS

**MOTION FOR CLERK'S ENTRY OF DEFAULT
REGARDING DEFENDANT ARRIVA BEST SECURITY, INC.**

Plaintiff Diby Ako, by and through his undersigned counsel, for his Motion for Clerk's Entry of Default Regarding Defendant Arriva Best Security, Inc. (hereinafter "Defendant"), he does hereby state and allege as follows:

1. Plaintiff filed his Original Complaint against Defendants on August 11, 2022. See ECF No. 1.
2. Plaintiff served Defendant Arriva Best Security, Inc., a summons and copy of the Complaint on March 18, 2023. See ECF No. 19.
3. Defendant Arriva Best Security, Inc.'s deadline for filing and serving an Answer or Motion to Dismiss was April 10, 2023.
4. Defendant Arriva Best Security, Inc. has not filed or served an Answer or Motion to Dismiss in accordance with Rule 12(a)(1). See Declaration of Josh Sanford ¶ 4, Exhibit 1 hereto.
5. No extension for Defendant to file or serve a proper Answer or Motion to Dismiss has been requested or granted. *Id.* at ¶ 5.

6. Defendant is in default, and the Clerk should enter its default as mandated by Rule 55(a).

WHEREFORE, premises considered, Plaintiff Diby Ako respectfully requests that the Clerk enter the default of Defendant Arriva Best Security, Inc., for attorney's fees and costs incurred herein, and for all other good and proper relief to which he may be entitled, whether or not specifically requested herein.

Respectfully submitted,

PLAINTIFF DIBY AKO

SANFORD LAW FIRM, PLLC
Kirkpatrick Plaza
10800 Financial Centre Parkway, Suite 510
Little Rock, Arkansas 72211
Telephone: (501) 221-0088
Facsimile: (888) 787-2040

/s/ Josh Sanford
Josh Sanford
Tex. Bar No. 24077858
josh@sanfordlawfirm.com

CERTIFICATE OF SERVICE

I, the undersigned counsel, do hereby certify that on the date imprinted by the CM/ECF system, a copy of the foregoing MOTION was filed via the CM/ECF system, which will provide notice to all interested parties. Notice has been delivered by other means to:

Arriva Best Security Inc.
c/o Aimee Koffee
5482 Wilshire Blvd. Ste. 219
Los Angeles, CA 90036

Amoifo Koffee
9955 Durant Drive, Unit 304
Beverly Hills, CA 90212

/s/ Josh Sanford
Josh Sanford